

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: RHODIUM ENCORE LLC, <i>et al.</i>¹ Debtor.	§ § § § § §	Case No. 24-90448-ARP Chapter 11
---	----------------------------	---

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that J. Michael Thomas and the law firm of Foley & Lardner LLP appear in this matter as counsel for Whinstone US, Inc. (“**Whinstone**”), and pursuant to Rules 2002, 3017, and 9010 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. § 1109(b), request that all notices given or required to be given in this case and all papers served or required to be served in this case be given to and served upon them at the following address:

Robert T. Slovak (TX 24013523)
Steven C. Lockhart (TX 24036981)
J. Michael Thomas (TX 24066812)
Mark C. Moore (TX 24074751)
Brandon C. Marx (TX 24098046)
FOLEY & LARDNER LLP
2021 McKinney Avenue, Suite 1600
Dallas, TX 75201
Telephone: (214) 999-3250
Facsimile: (214) 999-4667
rslovak@foley.com
slockhart@foley.com
jmthomas@foley.com
mmoore@foley.com
bmarx@foley.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes notices and papers referred to in the Federal Rules of Bankruptcy Procedure and includes, without limitation,

¹ The Debtors in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), and Rhodium 30 MW LLC (0263). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

any plans of reorganization, objections, notices of hearings, orders, pleadings, motions, applications, complaints, demands, requests, petitions, disclosure statements, memoranda, briefs and any other documents brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, whether transmitted or conveyed by mail, hand delivery, telephone, telecopier, telegraph, or telex.

This *Notice of Appearance and Request for Service of Papers* shall not be deemed or construed to be a waiver of the rights of Whinstone: (i) to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, or (iii) to have a District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal. All other rights, claims, actions, setoffs, or recoupments to which Whinstone is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

DATED: August 26, 2024

Respectfully submitted by:

/s/ J. Michael Thomas

Robert T. Slovak (TX 24013523)

Steven C. Lockhart (TX 24036981)

J. Michael Thomas (TX 24066812)

Mark C. Moore (TX 24074751)

Brandon C. Marx (TX 24098046)

FOLEY & LARDNER LLP

2021 McKinney Avenue, Suite 1600

Dallas, TX 75201

Telephone: (214) 999-3000

Facsimile: (214) 999-4667

rslovak@foley.com

slockhart@foley.com

jmthomas@foley.com

mmoore@foley.com

bmarx@foley.com

COUNSEL TO WHINSTONE US, INC.

CERTIFICATE OF SERVICE

I certify that I caused the foregoing document to be filed on August 26, 2024, using the Court's CM/ECF System which caused it to be served upon those parties registered in the system to receive such service.

/s/ J. Michael Thomas

J. Michael Thomas